

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Cassandra Bonita Woods,

Debtor.

Case No. 22-12757-mdc

Chapter 13

Debtor's Motion to Modify Chapter 13 Plan

AND NOW, Debtor Cassandra Bonita Woods, by and through her attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under chapter 13 on October 16, 2022.
2. The plan was confirmed on February 23, 2023.
3. The Debtor hereby requests that the Third Amended Chapter 13 Plan filed as ECF No. 45 be approved by the court and adopted as the confirmed chapter 13 plan.
4. The proposed plan: (i) adjusts payment on the secured claim of WSFS according to its recently-amended proof of claim, and (ii) provides for payment of attorney fees to the Debtor's counsel for post-confirmation services.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in her favor as may be necessary and proper under the law.

Date: December 6, 2023

CIBIK LAW, P.C.
Counsel for Debtor

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